

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

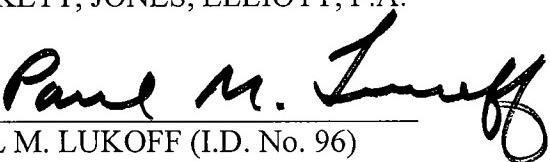
AMPEX CORPORATION,)
Plaintiff,)
v.) C.A. No. 04-1373-KAJ
EASTMAN KODAK COMPANY,)
ALTEK CORPORATION and CHINON)
INDUSTRIES, INC.,)
Defendants.)

**DEFENDANTS' MOTION TO BIFURCATE AND
MOTION FOR PROTECTIVE ORDER**

Pursuant to Rule 42(b) of the Federal Rules of Civil Procedure, Defendants move to bifurcate the issues for this patent infringement trial into two phases: (1) liability and damages; and (2) willful infringement. Defendants further move for a protective order staying discovery relating to opinions of counsel until after liability has been adjudicated.

Pursuant to Local Rule 7.1.1., defense counsel has made a reasonable effort to reach agreement with opposing counsel concerning the subject of this motion, without success.

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CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2006, I electronically filed **DEFENDANTS' MOTION TO BIFURCATE AND MOTION FOR PROTECTIVE ORDER** with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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I hereby certify that on February 22, 2006, I have forwarded the above-noted document to the following as noted below:

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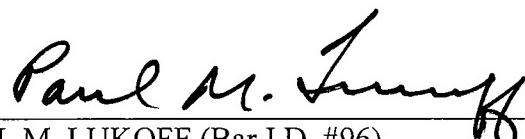
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